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Attorneys for Defendant
LG Electronics USA, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE LG FRONT LOAD WASHING
MACHINE CLASS ACTION
LITIGATION**

X

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: Honorable Faith S. Hochberg, U.S.D.J.

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: Case No. 2:08-cv-00051-FSH-MAS

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: **DEFENDANT LG ELECTRONICS USA, INC.'S**

: **NOTICE OF MOTION TO DISMISS**

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: **Oral Argument Requested**

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: **Return Date: July 21, 2008**

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X

TO: ALL COUNSEL OF RECORD

COUNSEL:

PLEASE TAKE NOTICE that on July 21, 2008 at 9:00 a.m., or as soon thereafter as counsel may be heard, the undersigned attorneys for Defendant LG Electronics USA, Inc. ("LG") will move before the Honorable Faith S. Hochberg, U.S.D.J., at the United States District Court, M.L. King, Jr., Federal Bldg. & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07102, for an Order granting its motion to dismiss pursuant to Fed. R. Civ. P. 12(b)(6) for failure to state a claim upon which relief can be granted.

PLEASE TAKE FURTHER NOTICE that in support of said Motion, LG will rely upon the Memorandum of Law submitted herewith.

PLEASE TAKE FURTHER NOTICE that LG respectfully requests oral argument.

WINSTON & STRAWN LLP
Attorneys for Defendant
LG Electronics USA, Inc.

By: /s/ Melissa Steedle Bogad
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Dated: June 20, 2008

CERTIFICATION OF SERVICE

I hereby certify that on June 20, 2008, copies of the foregoing Notice of Motion and supporting documents were electronically filed and served by electronic mail upon the following:

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_____/s/ Melissa Steedle Bogad
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Dated: June 20, 2008